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*Lead Counsel for Lead Plaintiff
and the Settlement Class*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

CHENG JIANGCHEN, Individually
and on Behalf of All Others Similarly
Situated,

Plaintiff,

vs.

RENTECH, INC., KEITH B.
FORMAN, and JEFFREY SPAIN,

Defendants.

Case No. 2:17-cv-01490-GW-FFM

**LEAD PLAINTIFF'S NOTICE
OF MOTION AND MOTION
FOR FINAL APPROVAL OF
CLASS ACTION
SETTLEMENT AND PLAN OF
ALLOCATION**

Date: October 10, 2019
Time: 8:30 a.m.
Crtm: 9D
Judge: Hon. George H. Wu

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that pursuant to Rule 23(e) of the Federal Rules of Civil Procedure and the Court's Order Granting Preliminary Approval of Class Action Settlement ("Preliminary Approval Order," ECF No. 102), on October 10, 2019, at 8:30 a.m., or as soon thereafter as counsel may be heard, at the United States Courthouse, Courtroom 9D, 350 W. 1st Street, Los Angeles, CA 90012, before the Honorable George H. Wu, District Judge, Lead Plaintiff Ichiro Ikuno ("Lead Plaintiff") will and hereby does move the Court for: (1) entry of the [Proposed] Judgment Approving Class Action Settlement; and (2) entry of the [Proposed] Order Approving Plan of Allocation of the Net Settlement Fund.

This Motion is based on this Notice of Motion; the memorandum of points and authorities in support thereof; Declaration of Ex Kano S. Sams II and Corey D. Holzer in Support of: (1) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (2) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses and the exhibits filed therewith; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

Lead Plaintiff conferred with Defendants prior to filing this motion in accordance with Local Rule 7-3. Defendants do not oppose this motion.

STATEMENT OF ISSUES TO BE DECIDED

1. Whether the Court should approve the proposed \$2,050,000 cash Settlement of this Action as fair, reasonable, and adequate under Rule 23(e).

2. Whether the Court should approve the Plan of Allocation as fair and reasonable.

3. Whether the Court should finally certify the Action as a class action pursuant to Rules 23(a) and (b)(3) for the purposes of the Settlement only.

1 DATED: September 5, 2019

GLANCY PRONGAY & MURRAY LLP

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4 By: /s/ Ex Kano S. Sams II

EX KANO S. SAMS II (#192936)

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15 *Lead Counsel for Lead Plaintiff and the*
16 *Settlement Class*
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PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On September 5, 2019, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Central District of California, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 5, 2019, at Los Angeles, California.

s/ Ex Kano S. Sams II

Ex Kano S. Sams II